



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



330318

June 8, 2009

REPLY TO THE ATTENTION OF:

SR-6J

Via Fax, Certified Mail Return
Receipt Requested and E-Mail

John W. Hilbert, Esq.
Shumaker, Loop & Kendrick
North Courthouse Square
1000 Jackson Street
Toledo, OH 43624-1573
Fax: 419-241-6894

RE: Comments on Draft Removal Action Report for the Former Eagle-Picher Site, Delta, Ohio
Administrative Order by Consent (AOC) Docket No. V-W-'98-C-458

Dear Mr. Hilbert:

On behalf of Bunting Bearings, LLC, Civil & Environmental Consultants, Inc. submitted a draft Removal Action Report to the United States Environmental Protection Agency (U.S. EPA) pursuant to the requirements of the above-referenced AOC. U.S. EPA and its contractor Weston Solutions, Inc. have reviewed the Report and have the following comments.

1. **General Comment:** Throughout Sections 3 and 4, descriptions of removal and sampling activities have been provided which are difficult to follow without locations and samples depicted on Figures. Provide figures depicting the locations along with the description.
2. **General Comment:** The locations of verification samples collected during removal action should be shown on a figure. Provide figure(s) showing locations of verification samples.
3. **General Comment:** Provide photo-documentation for the Removal Action.
4. **Page 8:** The last paragraph on Page 8 states that Alternative 5, excavation and hazardous landfill disposal, was the selected method of on-site soil remediation and disposal. However, the method used during the excavation and disposal of the on-site soil, on-site stabilization and solid waste landfill disposal, was the method used during the removal action. This needs to be clarified in the report.
5. **Page 16, Section 4.1.3:** The second paragraph of this section states that "a correlation was developed between TSP airborne lead concentrations and mini-RAM airborne particulate matter concentrations." However, the specific action level developed through this correlation is not stated in this section, nor is it mentioned how long the exceedance

would last before CEC would institute additional dust suppression and engineering controls.

6. **Page 44, Section 4.6.3:** This section provides descriptive information on the samples that CEC collected from the Fewless Creek culvert on September 12 and 19, 2002, but does not provide any descriptive information on the sample that CEC collected on October 24, 2002 (VCD-15-0.5). CEC should amend this section to include the pertinent information on this sample.
7. **Page 49, Section 4.7.1:** In the third paragraph, CEC states that the five verification samples collected from Area P3 were analyzed for lead. However, based on the chain-of-custody form shown in the analytical documentation (see enclosed CD-ROM), Sample VNP3-05-6.0 was not analyzed for total lead. As such, CEC should review the report and state, specifically, which verification soil samples were or were not analyzed for total lead.
8. **Page 52, Section 4.7.3.2:** Based on the available chain-of-custody forms for Building A-4, CEC collected four additional samples (VNA4-08-4.15, VNA4-09-4.15, VNA4-10-4.15, and VNA4-11-2.0) for total lead analysis. However, CEC does not provide any information, in Section 4.7.3.2, on these four samples, even though the analytical results for these samples are provided in Table 6. As such, CEC should review the analytical documentation to ensure that CEC provides information on all of the samples collected from each of the site buildings.
9. **Page 53, Section 4.7.3.2:** The third paragraph of this section states that the foundations within Building A-4 were encapsulated with Lead Barrier Compound prior to the backfilling of Building A-4. This procedure was also used for Building A-5; however, no mention is made of this in the section that pertains to Building A-5 (Section 4.7.3.1).
10. **Page 56, Section 4.7.4:** This section states that ENTACT demolished Buildings B-16 through B-20 during the initial stage of the Phase 4 activities. However, there is no designation for Building B-17 on the attached site diagram (Figure 2).
11. **Page 68, Section 4.7.7.3:** In the second paragraph of this section, CEC lists the samples collected from the eastern portion of the South Yard. On the same day that CEC collected VNSY-01-50", it also collected Sample VNB23-01-33" (presumably from Building B-23). However, no Building B-23 is shown in Figure 2 (Site Layout), nor is any information given in the report concerning this sample. Also, this paragraph states that, beginning on April 12, 2004, CEC collected Sample VNSY-02-36". However, this sample was actually collected on March 10, 2004. The sample that CEC collected, beginning on April 12, 2004, was VNSY-02-40". The sample names listed in this paragraph do not match the names provided on the chain-of-custody form provided on the CD-ROM (A4D130105.pdf) for April 12, 2004.

- 12. Page 69, Section 4.7.7.4:** In the third paragraph of this section, CEC discusses the results of the PCB and asbestos samples that CEC collected from Building B-25. However, Table 20 does not provide the analytical results for the samples that CEC used to determine the PCB and asbestos levels in Building B-25 (B25-chip-1, B25-chip-2, and B25-Chip-3). CEC should add the results for these samples to Table 20.
- 13. Page 85, Section 4.12:** Provide figure showing areas of deed restriction.
- 14. Figure 2, Site Layout :** This figure does not show the field of VOC-impacted soil that exists to the east of, and under, Building A-3. Also, CEC did not provide a diagram or diagrams that show the points from which CEC collected the soil cleanup verification samples.
- 15. Figure 3, Removal Action Area of Offsite Removal :** This figure should be updated so that (1) Plant 1 and Plant 2 properly reflect the demolition of specific site buildings (B-16 through B-20, B-1 through B-7, B-1A, B-1D, B-1E, B-24, and B-25) and (2) the excavation area (beige color) properly reflects the entire on-site area where excavation of impacted soil took place.

Within 30 days of receipt of this letter, please submit a Final Removal Action Report incorporating the changes and correcting the deficiencies noted in the comments. If you have any questions in this matter, please contact me at (312) 886-4442 or Craig Melodia at 312-353-8870.

Sincerely,



Matthew J. Ohl
Remedial Project Manager

cc via e-mail: Archie Lunsey, Ohio EPA, archie.lunsey@epa.state.oh.us
 Dave Click, CEC, Inc., dclick@cecinc.com
 Craig Melodia, U.S. EPA - ORC, craig.melodia@epa.gov
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Page 8, 2009

U.S. EPA REGION 5
SR-03

Via Fax, Certified Mail Return Receipt Requested and E-Mail

John W. Hilbert, Esq.
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RE: Comments on Draft Remedial Action Report for the Former Eagle-Picher Site, Delta, Ohio
Administrative Order by Consent (AOC) Docket No. A-14-98-0458

Dear Mr. Hilbert,

On behalf of Planning Hearings, LLC, Civil & Environmental Consultants, Inc. submitted a draft Remedial Action Report to the United States Environmental Protection Agency (U.S. EPA) pursuant to the requirements of the above-referenced AOC. U.S. EPA and its contractor Western Solutions, Inc. have reviewed the Report and have the following comments:

1. **General Comment:** Throughout Sections 3 and 4, descriptions of removal and sampling activities have been provided which are difficult to follow without locations and samples depicted on figures. Provide figures depicting the locations along with the descriptions.
2. **General Comment:** The locations of verification samples collected during removal action should be shown on a figure. Provide figures showing locations of verification samples.
3. **General Comment:** Provide photo documentation for the Remedial Action.
4. **Page 8:** The last paragraph on Page 8 states that "Alternatively, S₁ excavation and hazardous landfill disposal, was the selected method of on-site soil remediation and disposal. However, the method used during the excavation and disposal of the on-site soil, on-site stabilization and solid waste landfill disposal, was the method used during the removal action. This needs to be clarified in the report.
5. **Page 10, Section 4.1.3:** The second paragraph of this section states that "a correlation was developed between VSP airborne lead concentrations and non-RM airborne particulate matter concentrations." However, the specific action level developed through this correlation is not stated in this section, nor is it mentioned how long the exceedance

Approved For Release by EPA Region 5, Toledo, Ohio, on 06/08/2009 at 10:00 AM